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Via ECF and Hand Delivery   June 15, 2018

The Honorable George B. Daniels   The Honorable Sarah Netburn
Daniel Patrick Moynihan U.S. Courthouse   Thurgood Marshall United States Courthouse
500 Pearl Street   40 Foley Square, Room 430
New York, NY 10007   New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*
       03 MDL 1570 (GBD) (SN)

Dear Judge Daniels and Judge Netburn:

We represent the Plaintiffs who commenced actions on June 12-14, 2018 by adopting the Iran Short Form Complaint and asserting the factual and jurisdictional allegations from the *Burnett* Iran Complaint.

Pursuant to Judge Netburn's Order dated May 25, 2018, docketed under the MDL as Docket Number 4010 ("May 25, 2018 Order"), we write to respectfully request that the following cases be made part of this MDL[1]:

1.   *DeRubbio, et al. v. Islamic Republic of Iran*;
      Case Number: 1:18-cv-05306 (Exhibit 1)

2.   *Roberta Agyeman, et al. v. Islamic Republic of Iran*;
      Case Number: 1:18-cv-05320 (Exhibit 2)

3.   *Horace Morris, et al. v. Islamic Republic of Iran*;
      Case Number: 1:18-cv-05321 (Exhibit 3)

4.   *Laurence Schlissel, et al. v. Islamic Republic of Iran*;
      Case Number: 1:18-cv-05331 (Exhibit 4)

5.   *Bakahityar Kamardinova, et al. v. Islamic Republic of Iran*;
      Case Number: 1:18-cv-05339 (Exhibit 5)

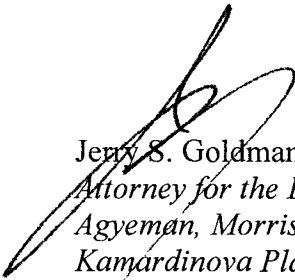[1]   Copies of the pleadings and Statements of Relatedness are attached to this letter as exhibits.

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Anderson Kill & Olick, P.C.

> The Honorable George B. Daniels
> The Honorable Sarah Netburn
> June 15, 2018
> Page 2

Pursuant to the May 25, 2018 Order, we intend to file Notices of Amendment adding in additional solatium claims.

We thank the Court for its attention to this matter.

Respectfully submitted,

Jerry S. Goldman
*Attorney for the DeRubbio,
Agyeman, Morris, Schlissel and
Kamardinova Plaintiffs*

cc: All MDL Counsel of Record (via ECF)
Enc. A/S

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